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ATTORNEYS FOR DEFENDANTS
TRIANGLE CROSS RANCH, LLC
GERALD E. SCHNEIDER; MICHAEELEEN P. SCHNEIDER
MATHEW SCHNEIDER; MARK SCHNEIDER and THOMAS GEORGE

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING

ANDREW SCAVUZZO and EHAN JELINEK., on)
behalf of themselves and all similarly situated persons,)

vs.)

Plaintiffs,)

Case No. 1:20-CV-215-SWS

TRIANGLE CROSS RANCH, LLC, a Wyoming)
Limited liability corporation; GERALD E. SCHNEIDER;)
MICHAEELEEN P. SCHNEIDER; MATTHEW)
SCHNEIDER; MARK SCHNEIDER; THOMAS)
GEORGE; and the SOCIETY OF OUR LADY OF)
THE MOST HOLY TRINITY, a Texas corporation.,)

Defendants.

**TCR DEFENDANTS' MOTION FOR LEAVE OF COURT TO FILE RESTRICTED
ACCESS DOCUMENTS**

The TCR Defendants, through undersigned counsel, pursuant to the Stipulated Protective Order previously entered in this case on January 11, 2022 [ECF No. 176] and Local Rule 8.1, respectfully request leave of Court to file the Defendants' Response to Plaintiffs' Motion to

Substitute Named Plaintiff and for Leave to Amend Complaint as restricted access, and state as follows in support thereof:

1. The Stipulated Protective Order entered in this matter on January 11, 2022, states at paragraph 10 that all documents that “are filed with the Court for any purpose and that contain material designated as confidential ... shall be provisionally filed under restricted access with the filing party’s motion for leave to file restricted access documents.” Included in the documents to be filed with these Defendants’ response are documents that these Defendants have designated as confidential, including releases and consent forms signed by the parents/guardians of a named Plaintiff Jelinek and a potential plaintiff, minor T.I. related to their treatment at the Triangle Cross Ranch therapeutic boarding program. Specifically, these documents are Exhibits A and B to the Motion.

2. Additionally, although it does not appear that the provisions of Local Rule 8.1 specifically apply to this situation, the spirit and policy behind Rule 8.1 also provide good cause for the response to be filed under restricted access.

3. The Stipulated Protective Order does apply to this situation and because the Stipulated Protective Order was stipulated to by the parties, the undersigned understands that no conferral of counsel is therefore required in this situation.

4. The proposed Order granting these Defendants leave of Court to file the response as “non-public” is submitted herewith for the Court’s convenience.

5. For these reasons, these Defendants respectfully request an Order granting leave of Court for the filing of their Response to Plaintiffs’ Motion to Substitute Named Plaintiff and for Leave to Amend Complaint, and any further relief that the Court deems just and proper.

Respectfully submitted this 28th day of March, 2022.

WHITE & STEELE, P.C.

/s/ John C. Matthews

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 28th day of March, 2022, a true and correct copy of the foregoing document was e-filed via CM/ECF and served to all attorneys of record:

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For White and Steele, P.C.